

REMARKS

The Office Action rejects claims 1, 2, 5-19, 22-30, 34-35, 38-42, 44, 47, and 49-50 under 35 U.S.C. § 102(b) as being allegedly anticipated by COLEY (U. S. Pat. No. 5,826,014); and rejects claims 3, 4, 20, 21, 31-33, 36-37, 45-46, and 48 under 35 U.S.C. § 103(a) as being unpatentable over COLEY in view of WIN (U. S. Pat. No. 6,182,142). Applicants respectfully traverse these rejections with respect to the claims as currently presented.¹

I. Claims 1, 2, 5-19, 22-30, 34-35, 38-42, 44, 47, and 49-50 are not anticipated by COLEY under 35 U.S.C. § 102(b)

The Office Action rejects claims 1, 2, 5-19, 22-30, 34-35, 38-42, 44, 47 and 49-50 under 35 U. S. C. § 102(b) as allegedly being anticipated by COLEY. Applicants respectfully submit that COLEY does not anticipate claims 1, 2, 5-19, 22-30, 34-35, 38-42, 44, 47 and 49-50, for the reasons below. The reasons already have been presented with the Amendment filed on April 3, 2006, but the Office has not yet addressed them on the merits.

A proper rejection under 35 U.S.C. § 102 requires that a single reference disclose every aspect of the claimed invention. Any feature not directly taught must be inherently

¹ As Applicants' remarks with respect to the Office Action's rejections are sufficient to overcome these rejections, Applicant's silence as to assertions by the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute these assertions/requirements in the future.

present. See M.P.E.P. § 2131. COLEY does not disclose the combination of features recited in claims 1, 2, 5-19, 22-30, 34-35, 38-42, 44, 47 and 49-50.

For example, claim 1 recites “a method for accessing resources on a private network via an intermediary server, said method comprising (a) receiving a login request from a user for access to the intermediary server; (b) authenticating the user; (c) subsequently receiving a resource request from the user at the intermediary server, the resource request requesting a particular operation with respect to a resource from the private network; (d) obtaining access privileges for the user; (e) determining whether the access privileges for the user permit the user to perform the particular operation at the private network; and (f) preventing performance of the particular operation at the private network such that a response to the resource request is not had when said determining (e) determines that the access privileges for the user do not permit the user to perform the particular operation at the private network.” COLEY does not disclose or suggest this combination of features.

For example, COLEY does not disclose or suggest receiving a login request from a user for access to an intermediary server, as recited in claim 1. The Office Action relies on col. 10, line 1, to col. 11, line 31, of COLEY for allegedly disclosing this feature (Office Action, pg. 3). Applicants submit COLEY does not disclose or suggest the above feature of claim 1.

At col. 10, line 1, to col. 11, line 31, COLEY discloses a test that can be performed by a proxy agent in a firewall device in response to receiving a request for access to a destination device. The test involves checking whether the destination

address indicated by an access request is authorized. This section of COLEY also discloses that when the proxy agent successfully completes its set of verification tests, the proxy agent initiates a connection request to the destination device. This section of COLEY in no way discloses or suggests receiving a login request from a user for access to an intermediary server, as required by claim 1.

COLEY discloses a user accessing a destination device through a proxy agent in a firewall device. Thus, Applicants assume the Office Action alleges that the proxy agent (or firewall device) corresponds to the intermediary server recited in claim 1. With this interpretation in mind, COLEY in no way discloses or suggests receiving a login request from a user for access to a proxy agent (or firewall device), as would be required by the Office Action's interpretation of claim 1. Instead, COLEY merely discloses that the proxy agent acts to restrict access to destination devices (see, for example, col. 5, lines 49-64).

The Office Action has not pointed to any section of COLEY that discloses receiving a login request from a user for access to an intermediary server, as required by claim 1. Therefore, a proper case of anticipation has not been established with respect to claim 1.

The above arguments were presented in the Amendment, filed April 3, 2006. Applicants respectfully request the above arguments be addressed or that the rejection of claim of 1 based on COLEY be withdrawn.

For at least the foregoing reasons, Applicants submit that claim 1 is not anticipated by COLEY.

Claims 2 and 5-18 depend from claim 1. Therefore, these claims are not anticipated by COLEY for at least the reasons given above with respect to claim 1.²

Independent claim 19 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 1. Therefore, Applicants submit that claim 19 is not anticipated by COLEY for at least reasons similar to reasons given above with respect to claim 1.

Claims 22-30 depend from claim 19. Therefore, these claims are not anticipated by COLEY et al. for at least the reasons given above with respect to claim 19.

Independent claims 34 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 1. Therefore, Applicants submit that claim 34 is not anticipated by COLEY for at least reasons similar to reasons given above with respect to claim 1.

Claims 35 and 38-42 depend from claim 34. Therefore, these claims are not anticipated by COLEY for at least the reasons given above with respect to claim 34.

Independent claim 44 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 1. Therefore, Applicants submit that claim 44 is not anticipated by COLEY for at least reasons similar to reasons given above with respect to claim 1.

Claims 47 and 49-50 depend from claim 44. Therefore, these claims are not anticipated by COLEY for at least the reasons given above with respect to claim 44.

² As Applicants' remarks with respect to the base independent claims are sufficient to overcome the Office Action's rejections of all claims dependent therefrom, Applicants' silence as to the Office Action's assertions with respect to dependent claims is not a concession by Applicants to the Office Action's assertions as to these claims, and Applicants reserve the right to analyze and dispute such assertions in the future.

II. Claims 3-4, 20-21, 23, 31-33, 36-37, 45-46, and 48 are patentable over COLEY in view of WIN under 35 U.S.C. § 103(a)

The Office Action rejects claims 3-4, 20-21, 31-33, 36-37, 45-46, and 48 under 35 U.S.C. § 103(a) as being unpatentable over COLEY in view of WIN. Applicants respectfully submit that claims 3-4, 20-21, 31-33, 36-37, 45-46, and 48 are patentable over COLEY in view of WIN under 35 U. S. C. § 103(a).

Claims 3 and 4 depend from claim 1. The disclosure of WIN does not remedy the deficiencies in the disclosure of COLEY set forth above with respect to claim 1. Therefore, claims 3 and 4 are patentable over COLEY and WIN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1. Moreover, these claims are patentable over COLEY and WIN for reasons of their own.

For example, claim 3 recites “the authenticating determines whether the user is authenticated based on an external authentication server.” The Office Action admits that COLEY does not disclose this feature (pg. 9, Office Action). Rather, the Office Action relies on Fig. 5A of WIN for allegedly disclosing the feature of claim 3 (pg. 9, Office Action).

While not acquiescing in the Office Action’s allegation, Applicants submit that one skilled the art would not seek to modify COLEY to include features disclosed in WIN, absent impermissible hindsight. With respect to motivation, the Office Action alleges “it would have been obvious ... to combine the authentication of Coley with the

external authentication of Win” (pg. 9, Office Action). The Office Action further alleges, “a person of ordinary skill in the art would have been motivated to do this because this is quality of a conventional firewall system,” citing to lines 19-22 in column 7 in COLEY.

At lines 14-23 (which includes lines 19-22) in column 7, COLEY discloses:

By providing the firewall 210 in this *stand alone* configuration [italics added for emphasis], any and all access from the public network 202 to the internal network 214 must go through the firewall 210. Hence a user operating a host machine 200 who attempts to access the internal network 214 via the public network 202 must go through the firewall 210. *This arrangement is more robust than conventional firewall systems that are susceptible to being bypassed either physically or through applications sharing the firewall computing platform* [italics added for emphasis].

According to the section above, a stand alone firewall configuration is favored over other configurations, and therefore, COLEY teaches *away* from combining its firewall with an external authentication server. Therefore, Applicants assert, without conceding that WIN teaches authenticating determines whether the user is authenticated based on an external authentication server, that one of ordinary skill in the art at the time of the invention would not be motivated to combine WIN’s alleged disclosure of determining whether the user is authenticated based on an external server into COLEY system, absent impermissible hindsight.

For at least these additional reasons, Applicants respectfully submit claim 3 is patentable over COLEY in view of WIN.

Claims 20, 21, and 23 depend from claim 19. The disclosure of WIN does not remedy the deficiencies in the disclosure of COLEY set forth above with respect to claim 19. Therefore, claims 20, 21, and 23 are patentable over COLEY and WIN, whether taken alone or in any reasonable combination, for at least the reasons given above with

respect to claim 19. Moreover, these claims are patentable over COLEY and WIN for reasons of their own.

For example, claim 20 recites “(f1) retrieving the particular resource from a content server; (f2) modifying at least one URL within the particular resource; and (f3) sending the modified resource to the remote user.” The Office Action admits COLEY does not disclose these features (pg. 10, Office Action). Rather, the Office Action relies on lines 45-55 of column 8 in WIN for allegedly disclosing the above features of claim 20 (pg. 10, Office Action). Applicants respectfully disagree with the Office Action’s interpretation of WIN.

At lines 45-55 of column 8, WIN discloses:

Fig. 3C is a state diagram showing processes carried out when the URL is a protected resource and the user is authenticated. After the user has been authenticated in state 312, Runtime Module 206 calls the Authorization Verification Service to check that the user has the right to access the protected resource. All authenticated users have the right to access “public” resources. In state 318, the Runtime Module 205 tests whether the resource is a public resource. If so, then Runtime Module 206 returns a direction to one or more resource pages, and HTTP Server 202 returns the redirection to browser 100, as shown by state 308.

This section of WIN discloses that Runtime Module 206 performs redirection. The process does not involve *modification* of URL within a resource, but involves sending a browser to the replacement URL when the browser is destined for a given URL. Thus, the above section in WIN does not disclose modifying at least one URL within the particular resource and sending the modified resource to the remote user, as recited in claim 20. Accordingly, Applicants assert COLEY and WIN, individually or in

combination, do not disclose or suggest modifying at least one URL with the particular resource and sending the modified resource to the remote user, as recited in claim 20.

For at least these additional reasons, Applicants respectfully submit that claim 20 is patentable over COLEY in view of WIN.

Claims 21 and 23 recite features similar to, yet possibly of different scope than, features recited above with respect to claim 20. Therefore, Applicants submit that claims 21 and 23 are patentable over COLEY in view of WIN, for at least reasons similar to reasons given above with respect to claim 20.

Claim 31 recites “an intermediary server system comprising a web server that receives requests for resources from client machines via a network; a protocol handler operatively connected to said web server, said protocol handler receives the requests for resources, modifies the requests to be directed to appropriate remote servers via the private network, and forwards the modified requests for resources to the appropriate remote servers; and a content transformer operatively connected to said protocol handler, said content transformer receives the resources supplied by the appropriate remote servers in response to the modified requests and modifies the resources such that at least certain links contained therein are modified to be directed to said intermediary server system instead of remote servers.” COLEY and WIN, individually or in reasonable combination, do not disclose or suggest the recited features.

For example, COLEY and WIN do not disclose or suggest a content transformer, operatively connected to a protocol handler, that receives resources supplied by appropriate remote servers in response to modified requests and modifies the resources

such that at least certain links contained therein are modified to be directed to an intermediary server system instead of the remote servers. The Office Action relies on lines 35-62 in column 7, lines 63-67 in column 8, and lines 1-31 in column 9 of COLEY, for allegedly disclosing these features (pg. 11, Office Action). Applicants respectfully disagree with the Office Action's interpretation of COLEY.

At lines 35-62 in column 7, COLEY explains the operation of proxy agents that are included in the firewall. COLEY describes various ways in which the proxy agents may validate user access requests, but does not disclose or suggest a content transformer that is operatively connected to the protocol handler, where the content transformer receives the resources supplied by the appropriate remote servers in response to the modified requests and modifies the resources such that at least certain links contained therein are modified to be directed to said intermediary server system instead of remote servers, as recited in claim 31.

At lines 63-67 in column 8, COLEY states:

The firewall application comprises a plurality of proxy agents that are assigned to investigate and handle incoming access requests. A proxy agent is preferably assigned in accordance with a port number designation indicated in a request. The assigned proxy agent processes the access request, forms the connection, if verified, and manages ...

The above section of COLEY describes a proxy agent and its operation, but it does not disclose or suggest a content transformer that is operatively connected to the protocol handler, where the content transformer receives the resources supplied by the appropriate remote servers in response to the modified requests and modifies the resources such that

at least certain links contained therein are modified to be directed to said intermediary server system instead of remote servers, as recited in claim 31.

At lines 1-31 in column 9, COLEY describes security checks that may be implemented as proxy agents, such as verifying source addresses of access requests and matching a protocol to the appropriate port number of each access request. However, this section of COLEY fails to disclose or suggest a content transformer that is operatively connected to said protocol handler, where the content transformer receives the resources supplied by the appropriate remote servers in response to the modified requests and modifies the resources such that at least certain links contained therein are modified to be directed to said intermediary server system instead of remote servers, as recited in claim 31.

In view of the above, Applicants assert that COLEY and WIN, individually or in combination, do not disclose or suggest a content transformer that is operatively connected to said protocol handler, where the content transformer receives the resources supplied by the appropriate remote servers in response to the modified requests and modifies the resources such that at least certain links contained therein are modified to be directed to said intermediary server system instead of remote servers, as recited in claim 31.

Accordingly, Applicants respectfully submit that claim 31 is patentable over COLEY in view of WIN.

Claims 32 and 33 depend from claim 31. Therefore, claims 32 and 33 are patentable over COLEY and WIN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 31.

Claims 36 and 37 depend from claim 34. The disclosure of WIN does not remedy the deficiencies in the disclosure of COLEY set forth above with respect to claim 34. Therefore, claims 36 and 37 are patentable over COLEY and WIN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 34. Moreover, claims 36 and 37 are patentable over COLEY and WIN for reasons of their own.

For example, claim 36 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 3. Therefore, Applicants submit that claim 36 is patentable over COLEY in view of WIN for at least reasons similar to reasons given above with respect to claim 3.

Claim 37 recites “the intermediary server stores the access privileges for a plurality of servers and the intermediary server stores an authentication identifier for each of a plurality of users, the authentication identifier identifies an external authentication server to be used to perform authentication.” In rejecting claim 37, the Office Action gives exactly the same reasons that were cited in rejecting claim 3.

As already discussed above with respect to claim 3, COLEY teaches *away* from combining its firewall with an external authentication server, and thus, with any server in WIN. Therefore, Applicants assert, without conceding that WIN teaches the intermediary server stores the access privileges for a plurality of servers and the intermediary server

stores an authentication identifier for each of a plurality of users, the authentication identifier identifies an external authentication server to be used to perform authentication, as recited in claim 37, that one of ordinary skill in the art at the time of the invention would not be motivated to combine the COLEY and WIN, absent impermissible hindsight.

For at least these additional reasons, Applicants respectfully submit claim 37 is patentable over COLEY in view of WIN.

Claims 45, 46 and 48 depend from claim 44. The disclosure of WIN does not remedy the deficiencies in the disclosure of COLEY set forth above with respect to claim 44. Therefore, claims 45, 46 and 48 are patentable over COLEY and WIN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 44. Moreover, these claims are patentable over COLEY and WIN for reasons of their own.

Claims 45 and 46 recite features similar to, yet possibly of different scope than, features recited above with respect to claims 20 and 21. Therefore, Applicants submit that claims 45 and 46 are patentable over COLEY in view of WIN for at least reasons similar to reasons given above with respect to claims 20 and 21.

Claim 48 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 21. Therefore, Applicants submit that claim 48 is patentable over COLEY in view of WIN for at least reasons similar to reasons given above with respect to claim 21.

III. Conclusion

In view of the foregoing remarks, Applicants respectfully request the reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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